

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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KIARA WILLIAMS, and  
KIARA WILLIAMS as Parent and Guardian of  
AKERA WILLIAMS

**COMPLAINT**

Plaintiffs,

24-CV-7740

**Jury Trial Demanded**

-against-

LYFT BIKES AND SCOOTERS LLC, and  
CITI BIKE

Defendants.

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**NATURE OF THE ACTION**

1. This is an action to recover money damages arising out of injuries suffered by Plaintiffs, tourist from Trinidad and Tobago, while operating defective equipment owned, operated, controlled, and maintained by defendant, a Foreign Limited Liability Company registered in the State of New York.

**JURISDICTION AND VENUE**

2. This action is brought pursuant to 28 U.S.C § 1332 (Diversity of Citizenship; Amount in Controversy).

3. Venue is proper in this district, pursuant to 28 U.S.C. §1391 (b) and (c), on the basis of Defendants' residence and the location of the acts and / or omissions giving rise to the claim.

#### **JURY DEMAND**

4. Plaintiffs demand a trial by jury in this action.

#### **PARTIES**

5. Plaintiffs KIARA WILLIAMS and KIARA WILLIAMS as Parent and Guardian of AKERA WILLIAMS, a 16-year old minor("Plaintiff" or "Plaintiffs" or "Ms. Williams" and/or "Miss Williams") are citizens of Trinidad and Tobago, residing at 119 La Plata Village, Caura Royal Road, Tunapuna, Trinidad, West Indies.

6. Defendants, LYFT BIKES AND SCOOTERS LLC and CITI BIKE ("Defendants" or "Defendant" or "LYFT" or "CITI BIKE"), are a foreign limited liability company registered in the State of New York, that operates the Citi Bike system in the City of New York out of 28 Liberty Street, New York, New York 10005. At all times relevant herein, defendant owned, operated, controlled, and maintained the bike sharing hub located at or near Eastern Parkway and Ralph Avenue, Brooklyn, in Kings County, New York.

#### **STATEMENT OF FACTS**

7. At approximately 10:11 p.m. on August 15th, 2024, Plaintiffs, KIARA WILLIAMS and minor AKERA WILLIAMS were in the company of a family friend at or near the corner of Eastern Parkway and Ralph Avenue, Brooklyn, in Kings County, New York. The family friend paid for a group ride and took possession of at least three bikes from defendant's owned, operated, controlled, and maintained location. After testing the safety and functionality of the rented equipment, including but not limited to its braking, and after determining that the equipment appeared to operate as designed, they rode off together.

8. At that time the bikes' braking appeared to operate as designed, and they made it to their destination, the Brooklyn Museum, without incident.

9. After spending a short time at the location, plaintiffs began their return trip. At approximately 10:45 PM, as they navigated the downgrade along Eastern Parkway in approach to Nostrand Avenue, Plaintiff, minor AKERA WILLIAMS, attempted to brake to slow her descent. The brakes failed to engage, and having no means to slow the bike as she approached the busy intersection of Nostrand Avenue and Eastern Parkway, Miss Williams unsuccessfully attempted to use her feet on the pavement to bring the bike to a stop.

10. Careening out of control, the bike and Miss Williams slammed into the railing at the entrance to the New York City Transit

Subway station. Miss Williams suffered serious and permanent injuries, and continues to endure significant pain and suffering due to her injuries. Plaintiffs were transported to Kings County Hospital by ambulance, where Miss Williams was diagnosed with mandibular fractures on both sides of her jaw, a deep laceration on her chin, and several broken teeth.

#### **FIRST CLAIM**

11. Plaintiffs repeat and re-allege each and every allegation made from paragraph 1 to 10 as if fully set forth herein.

12. As a result of the negligence, recklessness and / or carelessness of the Defendants, their employees, servants and / or agents, Plaintiff, minor AKERA WILLIAMS, suffered serious and permanent physical injuries. Defendants, their employees, servants and /or agents, having prior knowledge that their equipment's brakes were prone to failure, failed to properly supervise, inspect, maintain, or repair the defective equipment which they owned, operated, controlled, and maintained.

13. As a direct and proximate result of Defendants' conduct, Plaintiffs sustained the damages herein before alleged, and seek damages in the amount of TEN MILLION DOLLARS (\$10,000,000.00).

#### **SECOND CLAIM**

14. Plaintiffs repeat and re-allege each and every allegation made from paragraph 1 to 13 as if fully set forth herein.

15. Plaintiff KIARA WILLIAMS, is the mother and guardian of minor Plaintiff, AKERA WILLIAMS, and as such, was and continues to be entitled to the comfort, enjoyment, society, and services of her daughter as guaranteed by the laws and constitution of the State of New York.

16. Defendants, their employees, servants and /or agents, by their failure to properly supervise, inspect, maintain, or repair the defective equipment which they owned, operated, controlled, and maintained; and for which they had prior knowledge of brake failures; deprived Plaintiff KIARA WILLIAMS of her aforementioned rights, by subjecting her to the shocking, emotional, and terrifying experience of observing firsthand, serious and permanent injuries being inflicted on her child, Plaintiff minor AKERA WILLIAMS.

17. As a direct and proximate result of Defendant's conduct, Plaintiffs sustained the damages herein before alleged, and seek damages in the amount of FIVE MILLION DOLLARS (\$5,000,000.00).

**PRAYER FOR RELIEF**

WHEREFORE, plaintiffs respectfully request judgment against defendants as follows:

(a) For the first cause of action, damages in the amount of TEN MILLION DOLLARS (\$10,000,000.00);

(b) For the second cause of action, damages in the amount of FIVE MILLION DOLLARS (\$5,000,000.00); and

(d) Such other and further relief as this Court deems just and proper.

DATED: November 6, 24  
Brooklyn, New York

A handwritten signature in blue ink, appearing to read 'Stanice John', with a long, wavy horizontal line extending to the right.

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